

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
Case No. 1:23-cv-00041-MR**

JACOB DOE,

Plaintiff,

v.

THE UNIVERSITY OF NORTH  
CAROLINA SYSTEM, et al.,

Defendants.

**DEFENDANTS' MOTION TO  
EXCLUDE OPINIONS OF  
PLAINTIFF'S EXPERT  
JACQUELINE WERNZ**

Defendants—the University of North Carolina System, the University of North Carolina at Chapel Hill (“UNC-CH”), the University of North Carolina at Chapel Hill Board of Trustees, the Board of Governors of the University of North Carolina, (the “UNC Defendants”), Lee Roberts, Elizabeth Hall, Jeremy Enlow, Beth Froehling, Rebecca Gibson, Jaclyn Feeney, David Elrod, and Desirée Rieckenberg, (the “Individual Defendants”)—move under Federal Rule of Evidence 702 and Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993) to exclude the opinions of Plaintiff Jacob Doe’s expert Jacqueline Wernz.

The grounds for this Motion are set forth in the accompanying Brief in Support.

Pursuant to Local Civil Rule 7.1(b), undersigned counsel certifies that counsel for Plaintiff and counsel for Defendants have conferred regarding this motion and Plaintiff opposes this motion.

This the 12th day of September, 2025.

**ELLIS & WINTERS LLP**

/s/Dixie T. Wells

Alex J. Hagan  
N.C. State Bar No. 19037  
P.O. Box 33550  
Raleigh, NC 27636  
Telephone: (919) 865-7000  
Facsimile: (919) 865-7010  
alex.hagan@elliswinters.com

Dixie T. Wells  
N.C. State Bar No. 26816  
P.O. Box 2752  
Greensboro, North Carolina 27402  
Telephone: (336) 217-4197  
Facsimile: (336) 217-4198  
dixie.wells@elliswinters.com

**JEFF JACKSON  
ATTORNEY GENERAL**

Lindsay Vance Smith  
N.C. State Bar No. 48085  
North Carolina Department of Justice  
P.O. Box 629  
Raleigh, NC 27602  
Telephone: (919) 716-6920  
Facsimile: (919) 716-6764  
lsmith@ncdoj.gov

Counsel for All Defendants

**UNIVERSITY OF NORTH CAROLINA  
AT CHAPEL HILL**

Marla Spector Bowman  
N.C. State Bar No. 49097  
123 W. Franklin Street, Suite 600  
Chapel Hill, NC 27516  
Telephone: (919) 962-1219  
marla\_bowman@unc.edu

Counsel for Defendant University of  
North Carolina at Chapel Hill